

UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF PUERTO RICO

IN RE.:

ELBA IRIZARRY CASTRO
xxx-xx -2462

DEBTOR

CASE NO.: 18-01254 EAG

CHAPTER 13

**DEBTOR'S MOTION FOR APPROVAL OF SETTLEMENT, AND REQUEST THAT
THE OBJECTION PERIOD BE SHORTENED TO SEVEN (7) DAYS**

Here comes Debtor Elba Irizarry Castro ("the Debtor") through the undersigned attorney,
and respectfully shows and prays:

1. On March 8, 2018 the Debtor filed this Chapter 13 Petition.
2. The National Law Firm Sanders Phillip Grossman filed a claim on behalf of the Debtor in a pelvic mesh case (class action).
3. The Law Firm has sent an Estimated Settlement dated June 29, 2021 (Exhibit A) to this attorney and the Chapter 13 Trustee. **Net recovery will be used to fund the Plan, and payable to Chapter 13 Trustee Jose R. Carrion.**
4. After the Approval of the Settlement, the Debtor will file a post confirmation modified plan considering these funds.
5. Since there is a Motion to Dismiss pending in this case (Docket 105) , the Debtor requests that the objection period be shortened to seven (7) day,

WHEREFORE, the Debtor respectfully requests this Court to enter an Order approving the Estimated Settlement, and that the objection period be shortened to seven (7) days.

CERTIFICATE OF ELECTRONIC FILING AND SERVICE

I HEREBY CERTIFY: that on this date I electronically filed the above document with the Clerk of the court using a CM/ECF System which sends notification of such filing to Chapter 13 Trustee and all true creditors if a CM/ECF user. I further certify that I have served this notice by depositing a true and correct copy thereof in the United States Mail, to non-user creditors, and to Sander Phillips Grossman LLC, 100 Garden City Plaza Ste 500, Garden City, NY 11530.

RESPECTFULLY SUBMITTED

In Mayaguez, Puerto Rico this 30th day of June, 2021

/S/ Gloria M. Justiniano Irizarry
USDC- PR - 207603
Ensanchez Martínez
Calle A. Ramírez Silva # 8
Mayagüez, PR 00680-4714
(787) 787-222-9272 & 805-2945
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Label Matrix Co. General Accounting 104-2 Case 18-01254-EAG13 District of Puerto Rico Once Wed Jun 30 10:27:38 AST 2021 BANCO POPULAR DE PUERTO RICO BANKRUPTCY DEPARTMENT PO BOX 366818 SAN JUAN PR 00936-6818	A/C SAN JOSE JOSE A SANTIN MONTILLA ESQ PO BOX 552 AIBONITO, PR 00705-0552	US Bankruptcy Court District of PR Jose V Toledo Fed Bldg & US Courthouse 300 Recinto Sur Street, Room 109 San Juan, PR 00901-1964
FIRST BANK CONSUMER SERVICE CENTER BANKRUPTCY DIVISION (CODE 248) PO BOX 9146 SAN JUAN PR, 00908-0146	Firstbank PO Box 9146 San Juan, PR 00908-0146	Island Finance PO Box 195369 P/C Banco Santander De Puerto Rico San Juan, PR 00919-5369
p)JEFFERSON CAPITAL SYSTEMS LLC PO BOX 7999 SAINT CLOUD MN 56302-7999	(p)CITIBANK PO BOX 790034 ST LOUIS MO 63179-0034	ELBA IRIZARRY CASTRO CALLE ALCAZAR 305 URB SULTANA MAYAGUEZ, PR 00680-1613
FLORIA JUSTINIANO IRIZARRY JUSTINIANO'S LAW OFFICE INSANCHE MARTINEZ CALLE A RAMIREZ SILVA MAYAGUEZ, PR 00680-4718	JOSE RAMON CARRION MORALES PO BOX 9023884 SAN JUAN, PR 00902-3884	MONSITA LECAROS ARRIBAS OFFICE OF THE US TRUSTEE (UST) OCHOA BUILDING 500 TANCA STREET SUITE 301 SAN JUAN, PR 00901

The preferred mailing address (p) above has been substituted for the following entity/entities as so specified
 by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g) (4).

Jefferson Capital Systems LLC PO Box 7999 Saint Cloud Mn 56302-9617	Sears PO Box 183081 Columbus, OH 43218-3081	End of Label Matrix Mailable recipients 14 Bypassed recipients 0 Total 14
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**SANDERS
PHILLIPS
GROSSMAN**

A National Law Firm

Settlement Administration
settlements@thesandersfirm.com

June 29, 2021

Juliél Pérez Méndez
Staff Attorney
Jose R. Carrion
Chapter 13 Trustee
PO Box 9023884
San Juan, PR 00902-3884

Re: **ESTIMATED SETTLEMENT**

RE: Elba Irizarry

Below please find the disbursement of the settlement proceeds with the defendant:

A. Gross Settlement Amount	\$9,932.69
B. Deductions:	
Attorney Fees	\$3,847.50
Attorney Fees Reduced	(\$500.00)
Case Associated Expenses	\$2,882.48
Common Benefit Fee	\$450.00
Lien Resolution Fee	\$75.00
Lien Payable	\$6.04
Total Deductions	\$6,761.02
C. Net Recovery	<u>\$3,171.67</u>

Very truly yours,

Sanders Phillips Grossman, LLC